

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO,
ET AL.,

Defendants.

No. 3:12-cv-2039 (GAG)

**JOINT MOTION REQUESTING ORDER APPOINTING JUAN MATTOS, JR. AS
TECHNICAL COMPLIANCE ADVISOR**

COME NOW jointly Plaintiff, United States of America, and Defendants, Commonwealth of Puerto Rico, et al., and respectfully inform this Court that the Parties have selected Juan Mattos, Jr. to serve as Technical Compliance Advisor (“TCA”) for the Sustainable Reform of the Puerto Rico Police Department (the “Agreement”). Dkt. 60. The Parties respectfully request that this Court endorse the Parties’ selection and issue an order of appointment to become effective upon Mr. Mattos’ separation from the United States Marshals Service on December 1, 2013. For cause, the Parties jointly state and allege:

1. Paragraph 271 of the Agreement provides, “Within 60 days from the Effective Date, the Parties shall together select an independent TCA, acceptable to both, who shall assess and report on PRPD’s implementation of this Agreement. The selection of the TCA shall be pursuant to a method jointly established by the Parties, and will not be governed by any formal or legal procurement requirements.” *Id.* On September 13, 2013, the Court extended the selection deadline to October 31, 2013. Dkt. 75.

2. As the Parties informed during the October 23, 2013, status conference, the Parties have worked diligently to identify a candidate who possesses the qualifications, knowledge, and experience necessary to successfully carry out the duties of the TCA. The Parties considered numerous objective factors in developing a candidate profile that included: (a) a demonstrated commitment to protecting civil rights; (b) extensive policing experience, including effectively managing and assessing agency performance; (c) implementing organizational change and institutional reform; (d) engaging with diverse community stakeholders to promote civic participation, strategic partnerships, and community policing; (e) use of technology and information systems to support and enhance law enforcement activities and initiatives; and (f) language and cultural competency.
3. After careful review and consultation, the Parties have selected Juan Mattos, Jr., as TCA to assist the Court, the Parties, and the public in promoting constitutional policing and determining whether the terms of the Agreement have been fully and timely implemented.
4. The Parties believe and agree that Mr. Mattos is uniquely qualified to serve as the TCA. In his nearly 40-year career in law enforcement, Mr. Mattos has served with distinction in numerous operational, supervisory, and administrative positions within the New Jersey State Police (NJSP). He was instrumental in assisting NJSP come into compliance with federal civil rights law under two consent decrees. He continues to serve the residents of New Jersey as United States Marshal for the District of New Jersey, a position he has held since 2011. Mr. Mattos' résumé is

attached hereto as Attachment A and provides a full account of his professional and educational achievements.

5. Specifically, during his tenure with NJSP, he promoted through the ranks, serving as a State Trooper, an Equal Employment Opportunity/Affirmative Action Officer, Commandant of the NJSP Academy, Commander of both the Division Staff and Intelligence Services Sections, and as Deputy Superintendent of Investigations and Operations. In his position as Deputy Superintendent of Operations, he played a leading role in bringing NJSP into full and faithful compliance with a consent decree designed to address and prevent discriminatory policing by state troopers. A team of independent monitors and state auditors validated NJSP's compliance and, in 2009, the United States District Court for the District of New Jersey terminated the consent decree.
6. Mr. Mattos intends to hire other experienced law enforcement professionals and subject-matter experts to assist him in providing technical assistance, assessing compliance, preparing reports, and engaging with the community. He also confirms his commitment to maintaining a meaningful presence in Puerto Rico to ensure direct oversight and communication with stakeholders.
7. Mr. Mattos intends to resign from the United States Marshals Service to avoid any conflict of interest as TCA. His separation from the Department of Justice will become effective by December 1, 2013.

WHEREFORE, the Parties respectfully request that the Court endorse the Parties' selection of Juan Mattos, Jr., as TCA and issue an order of appointment to become effective upon his separation from the United States Marshals Service on December 1, 2013.

Respectfully submitted, this 30th day of October, 2013,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically on this 30th day of October 2013, with the Clerk of Court using the CM/ECF System, which will provide notice of such filing to all registered parties.

S/ LUIS E. SAUCEDO

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